



CCWIS Overview for State and Tribal IT Staff

- **ACF's regulation for Comprehensive Child Welfare Information Systems became effective August 1, 2016**
- **Transition period gives states and tribes a two-year decision window**

The Administration for Children and Families (ACF) has issued a new regulation that replaces the Statewide and Tribal Automated Child Welfare Information System (S/TACWIS) requirements with a Comprehensive Child Welfare Information System (CCWIS). The new regulation provides state and tribal title IV-E agencies with additional flexibility over the old S/TACWIS requirements concerning the scope and operation of the child welfare information systems used to support their programs.

The CCWIS final rule was published in the Federal Register on Thursday June 2, 2016 and is available here:
<http://www.gpo.gov/fdsys/pkg/FR-2016-06-02/pdf/2016-12509.pdf>

Innovations in practice and service delivery models, advances in technology, and the extension of funding to tribal title IV-E programs have occurred since the issuance of the S/TACWIS regulations in the early 1990's. These changes have pointed to the need for more flexible, right-sized information systems that could collect data from a variety of sources and service providers.

Under CCWIS, the title IV-E agency has the flexibility to determine the size, scope, and functionality of its information system. The title IV-E agency can now choose to obtain service and client data directly from provider agencies that operate their own agency information systems through data exchanges. The regulation also gives title IV-E agencies more latitude in selecting development and technology approaches. The requirements for modularity make it easier to update or add a piece of new system functionality that reflects emerging needs or changing rules. Fundamentally, the new CCWIS regulations allow title IV-E agencies to support business practice with more flexible, modernized technology systems.

Building a CCWIS, like SACWIS or TACWIS, remains optional. There is no requirement that a title IV-E agency operate a CCWIS. If a title IV-E agency's current child welfare IT system fits its case management, federal reporting, technology, and resource needs, the agency may continue to use it.

This overview introduces the new regulation and explains the key provisions that your title IV-E agency must consider in assessing the changes in the CCWIS regulations.

CCWIS project requirements: The requirements for all CCWIS projects are found at 45 CFR 1355.50 through 1355.59.

The core CCWIS requirements at § 1355.52 are described in subsections (a) through (h):

(a) Efficient, economical, and effective: A CCWIS must support the efficient, economical, and effective administration of the programs carried out under state and tribal plans approved for titles IV-B and IV-E. The system must also enable the title IV-E agency to coordinate services with other federally funded programs, eliminate paperwork, and prevent duplicate data entry. In general, CCWIS modules and components must provide an efficient, effective, and economical method of exchanging information between state or tribal systems, as well as information systems operated by child welfare contributing agencies—external service providers that deliver investigation, placement, or case management services.

(b) CCWIS data: A strong focus on capturing and maintaining quality data, rather than on how or where the data is collected, is an integral part of CCWIS. A CCWIS must “maintain” data by storing it within the CCWIS and sharing data with any other information systems that provides data to the CCWIS. The CCWIS must maintain all program data mandated by federal and state or tribal statute and regulation as well as the data that the agency determines is needed for the administration of its approved plan for titles IV-B and IV-E. The CCWIS must maintain certain categories of data. Specifically, the agency’s CCWIS must maintain data that supports administration of the title IV-B and title IV-E program, state or tribal child welfare laws, regulations, policies, practices, reporting requirements, audits, program evaluations, and reviews. For states, CCWIS must additionally maintain data to support specific measures taken to comply with § 422(b)(9) of the Social Security Act related to the Indian Child Welfare Act (ICWA), National Youth in Transition Database (NYTD) data, and the National Child Abuse and Neglect Data System (NCANDS) data. Tribal title IV-E agencies are not required to submit ICWA, NYTD or NCANDS reports.

(c) Reporting: The CCWIS must use the data it collects and maintains to generate, or contribute to, required title IV-B and IV-E federal reports. The CCWIS reporting outputs must also conform to applicable formatting and submission requirements for those federal programs. Examples of federal reports covered by this requirement include the Adoption and Foster care Analysis and Reporting System (AFCARS); NCANDS (for states only); and NYTD (for states only); and contributions to the quarterly financial report on Form CB-496. The CCWIS must also maintain data to support the Child and Family Service Review (CFSR) process. The CCWIS must generate or contribute to reports that support state or tribal child welfare laws, regulations, policies, practices, reporting requirements, audits, and reviews.

(d) Data quality: CCWIS provides greater data collection flexibility to title IV-E agencies by permitting other systems to collect and electronically share data with CCWIS. This flexibility will require closer monitoring of data by title IV-E agencies. The IV-E agency must validate that data collected by child welfare contributing agencies and systems has the same meaning to all staff collecting, entering, and using the data. As a source for data used in federal, state or tribal

Data quality requirements are at 45 CFR 1355.52 (d)

reporting, CCWIS data must meet applicable federal and state or tribal standards for completeness, timeliness, and accuracy. Data elements must be consistently defined and uniformly collected and used across the CCWIS and its reporting systems.

The title IV-E agency must exchange and maintain CCWIS data in accordance with the confidentiality requirements of applicable federal and state or tribal laws. The confidentiality provisions also apply to agencies that are the recipients of confidential information from the CCWIS, such as child welfare contributing agencies or other systems used by the IV-E agency staff. Collected data must support child welfare policies, goals, and practices. Thus the data collected by or maintained in CCWIS should align with the agency's business needs and practices.

CCWIS data must not be created by default or inappropriately assigned by system logic. This prohibition does not apply to the appropriate use of system-calculated data. For example, the CCWIS may generate time stamps to capture the time of record entry, or may accurately derive or calculate data such as current age from the verified birth date and current date.

The CCWIS must provide automated alerts, reports, and other appropriate automated tools to assist users in accurate, timely, and complete data entry. For example, this could include the use of edits to identify missing, illogical or conflicting CCWIS data, or system designs that prevent users' need to re-enter data already captured or exchanged with CCWIS.

The CCWIS must also be able to send electronic requests to child welfare contributing agency systems to prompt their submission of current and historical data to the CCWIS, for example, timely placement updates, or a missing data element needed for AFCARS reporting.

The CCWIS must also generate regular or ad hoc reports of continuing or unresolved data quality problems, allowing title IV-E agencies to continuously monitor data quality and to assist in identifying weaknesses in data quality processes. For example, the CCWIS may flag the records of children in foster care without a reported home visit in expected timeframes, allowing supervisors to determine if a worker missed a visit or did not document the activity.

The title IV-E agency must conduct data quality reviews at least biennially to validate that CCWIS data complies with regulatory language in §1355.52 regarding the scope of its content, its completeness, timeliness, and accuracy. The agency's review must address data collected and stored by the CCWIS, as well as data exchanged with the CCWIS from child welfare contributing agencies, or through the bi-directional data exchanges mandated by the regulation. The agency's data quality review should also examine the use of the agency's established data exchange standard in certain data exchanges. The title IV-E agency must report review findings and any actions undertaken in response in the agency's Annual or Operational Advance Planning Documents (APDs).

The agency's initial review must be conducted no more than two years from the start date of data collection for a new CCWIS, or the date that ACF approves the agency's data collection system as a CCWIS.

Title IV-E agencies must develop and maintain a formal data quality plan to promote, monitor and enforce the quality of their collected data. ACF does not prescribe a standard template or format for the data quality plan, but specifies only that the plan must be included as part of the Annual

or Operational APD submission. Each agency should develop a plan that fully describes its data quality strategy, outlines how the agency will achieve compliance with the rule's data quality requirements, and responds to its own business needs for high-quality data. The plan should also describe how data quality expectations are detailed in data sharing agreements or contracts with data exchange partners and contributing agencies. This may be a standalone document, or may be incorporated into a larger, more comprehensive document that also addresses agency-level planning for the quality of other data used for federal program operation and federal and state reporting, such as data used in the CFSR process, or for AFCARS, NYTD and NCANDS submissions.

ACF will assess the data plan as part of its review of the APDs submitted by state and tribal title IV-E agencies. If significant data collection or data quality issues emerge, or remain problematic, ACF will take necessary action to remediate shortcomings.

(e) Bi-directional data exchanges: The CCWIS rule describes 11 bi-directional data exchanges, allowing the system to send and receive data from other information systems. Four data exchanges are required with the following automated systems:

- **Systems generating financial payments and claims data for titles IV-B and IV-E.** Requirements for a bi-directional data exchange with systems generating financial payments and claims data for title IV-B and IV-E as established in the former SACWIS rules are substantially unchanged. If the financial processing capacity is within the CCWIS, an interchange is not required.
- **Systems used to calculate one or more components of title IV-E eligibility determinations.** Requirements for an interface to systems calculating title IV-E eligibility established in the former SACWIS rules are substantially unchanged. Without duplicating functionality, the CCWIS must either document the data used to establish an individual's title IV-E eligibility, or obtain this data via an automated data exchange if this data is being generated in another system.
- **Systems external to CCWIS used by title IV-E agency staff to collect CCWIS data.** The CCWIS must have a bi-directional data exchange with each external automated system used by title IV-E agency staff to collect CCWIS data.
- **Systems used by child welfare contributing agencies to collect CCWIS data,** if any system other than the CCWIS is used to collect relevant case management data by these service provision partners.

New data exchanges:

- **Child welfare contributing agencies**
- **External systems collecting CCWIS data**
- **Medicaid claims systems**
- **Education**
- **Courts**

Other data exchanges for CCWIS must be implemented to the extent practicable, and include the following:

- **Child abuse and neglect system(s).** The CCWIS must exchange relevant data with the child abuse and neglect system (CANS); if the CANS is integrated into the CCWIS, the data exchange requirement is satisfied.
- **System(s) operated under title IV-A of the Act.** The CCWIS must include a data exchange with the system(s) used to administer the Temporary Assistance for Needy Families program.
- **Systems operated under title XIX to determine Medicaid eligibility; and mechanized claims processing and information retrieval systems as defined at 42 CFR 433.111(b).** Expectations for an interface with the Medicaid eligibility system, as established in the initial SACWIS rules are substantially unchanged. CCWIS regulations require a new data exchange with the Medicaid claims processing system or module. This will enable a CCWIS to maintain available health history for children and youth in foster care by exchanging relevant claims history and encounter data information with the MMIS.
- **Systems operated under title IV-D of the Act.** The requirement for data exchange with systems operated under title IV-D of the Social Security Act is substantially unchanged from the SACWIS regulations.
- **Systems operated by the court(s) of competent jurisdiction over title IV-E foster care, adoption, and guardianship programs.** The title IV-E agency must support one bi-directional data exchange with the systems operated by the court(s) of competent jurisdiction over the title IV-E foster care, adoption, and guardianship programs. This requirement is intended to provide the courts with relevant data from the child welfare information system that will support court hearings and judicial decision making; and to provide the title IV-E agency with outcome information about court actions, orders and decisions.
- **Systems operated by the state or tribal education agency, or school districts, or both.** Title IV-E agencies must offer educational opportunities for youth in foster care who are of the age for compulsory school attendance, and must plan for a child's educational stability as referenced in section 475(1)(G) of the Social Security Act. Where practicable, this data exchange can promote educational stability and positive outcomes for children in the care or custody of the title IV-E agency.

(f) Data exchange standard: A CCWIS must use a single data exchange standard for all data sharing activities with child welfare contributing agencies, and with any external system used by title IV-E agency staff to collect CCWIS data. A single data standard imposes continuous, consistent meaning for data shared between and across these systems. ACF does not impose a single national standard, but requires agencies to develop their own single standard that best meets their own business and technology needs. In developing a standard, the agency may use an established state or tribal common data sharing standard, develop a new standard, or adopt an existing standard such as the National Information Exchange Model.

(g) Automated eligibility determination: The CCWIS must support the determination of title IV-E eligibility in an automated manner. A state title IV-E agency must uniformly use the same automated function or the same group of automated functions for all title IV-E eligibility determinations for all children in the state. The CCWIS must document the data used to establish an individual's complete title IV-E eligibility in a manner so that it is available for independent review and audit; and must consistently and accurately apply all eligibility factors in every eligibility determination. A tribal title IV-E agency must meet the IV-E eligibility automation requirements for CCWIS to the extent practicable.

(h) Software provision: Upon request by ACF, the title IV-E agency must provide a copy of CCWIS software and associated documentation whenever designed, developed, or implemented with Federal Financial Participation (FFP). This will enable ACF to build a federal repository of accessible, proven CCWIS automated functions with potential for reuse by other state and tribal title IV-E agencies.

This provision does not apply to title IV-E agencies using commercial-off-the-shelf (COTS) products, acquired under an approved waiver of APD regulations at 45 CFR 95.627, and as defined as "proprietary software products that are ready-made and available for sale to the general public at established catalog or market prices" in Program Instruction ACF-OA-PI-13-01. Because ACF is not granted a license to COTS products or third party components that are not owned by the title IV-E agency, these products are excluded from the federal repository.

This provision does not in any way limit the federal access rights to system documentation, and cost and operational records of CCWIS projects using COTS products. The Department of Health and Human Services maintains its right of access to systems and records when FFP has been provided, as defined at 45 CFR 95.615. This access may include such materials as user documentation, operational manuals, vendor service agreements, and other project and system artifacts, and any operational and cost records that validate that conditions of the waiver approval are being met, program requirements are being satisfied and that the system solution is efficient, effective, and economical.

CCWIS design requirements: The inclusion of design requirements in CCWIS at § 1355.53 is intended to promote efficiency and economy in federal investments in child welfare technology. Unless exempted under certain conditions, CCWIS development activity must follow a modular design that separates the business rules from core programming, simplifies the language of system documentation, and adheres to a development standard. This may encourage the sharing and reuse of core functional modules, as states and tribes develop affordable and adaptable system components.

CCWIS functional modules must be designed for component reuse and interoperability: a module from one agency must be replaceable by an equivalent functional module from another agency. For example, the provider licensing module used by one state or tribe could be replaced by an updated licensing module from another agency.

CCWIS documentation must be in plain language that is accessible, consistent, easy to understand, and free of unexplained information technology jargon. Although system documentation may include detailed technical specifications, users must be able to understand

the meaning and purpose of an automated function from the documentation, and technical staff should be able to use it to understand, maintain, and enhance an automated function.

Automated functions within the CCWIS must be developed consistent with industry best practices, following an established standard with consistent protocols for product development and maintenance. ACF does not specify a single preferred development standard, but expects agencies to use a state, tribal or industry defined standard to promote efficient, economical, effective and reliable system development practices.

CCWIS automated functions must be developed in a manner that allows system components to be shared, leveraged, and reused within and across states and tribes. Reuse of CCWIS modules and components may enable title IV-E agencies to take advantage of proven solutions from their peers.

Title IV-E agencies may be exempted from these design requirements with ACF review and approval of an alternate design that is more efficient, economical, and effective than the modular design approach described in § 1355.53(a). This exemption request is solely limited to an agency's adoption of an advanced technological approach more efficient than the CCWIS modular design approach.

Transition Period: ACF provides a two-year transition period that ends on July 31, 2018. During that window, your state or tribal title IV-E agency must choose one of three approaches that makes the most business sense for your agency:

1. Transition your current system to a CCWIS.
2. Keep your legacy system throughout its expected lifespan as a non-CCWIS.
3. Build a new CCWIS.

If your agency chooses to transition your current system to a CCWIS, then your agency must inform ACF of its decision by July 31, 2018. If your agency currently operates a SACWIS, and chooses to keep the system through its expected lifespan as a non-CCWIS, then your agency must inform ACF of this decision by July 31, 2018. There is no deadline associated with the choice to build a new CCWIS; work may begin on that system at any time. System modification or development activity does not have to be completed within that transition period, but the agency must inform ACF about its decision before the end of the transition period. If your agency's decision is to replace your current system with a CCWIS, that new system may be built at any time during or after the transition period.

During the transition period, the title IV-E agency's work on a legacy S/TACWIS or non-S/TACWIS may qualify for title IV-E funding under your approved cost allocation methodology. You may maintain your legacy S/TACWIS during the transition period while you are building a new CCWIS.

If you build a new CCWIS:

To qualify for CCWIS funding, your agency must notify ACF of your intention to build a CCWIS, by submitting an APD or a Notice of Intent (NOI).

CCWIS regulations do not apply to a title IV-E agency that wishes to continue to operate a system that has been previously classified as a non-SACWIS or non-TACWIS. Such agencies with no plans to develop a CCWIS should continue to follow the regulations at 45 CFR part 95, Subpart F—

Automatic Data Processing Equipment and Services—Conditions for Federal Financial Participation (FFP) for developing, implementing, and operating their system.



How can we get assistance in understanding the new regulation?

Throughout the transition period, ACF will deliver webinars, develop technical assistance briefs, and offer guidance responsive to state and tribal concerns and emerging issues. These materials, and links to webinars sponsored by DSS, can be found at the Children’s Bureau website (<http://www.acf.hhs.gov/cb>) under the heading **Child Welfare Information Technology Training Resources**.

You are encouraged to call your assigned federal analyst within the Division of State Systems to discuss any questions and concerns, and to explore your agency’s available options. The list of federal analysts and their state and tribal assignments can be found on the Children’s Bureau website under the State and Tribal Assignments tab. Questions about CCWIS can also be submitted to CCWIS.questions@acf.hhs.gov.